

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ABRAHAM BARKHORDAR, SARAH ZELASKY,  
and ELLA WECHSLER-MATTHAEI, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE,

Defendant.

No. 1:20-cv-10968-AK

Hon. Angel Kelley

**JOINT MOTION FOR PROTECTIVE ORDER AND ORDER REGARDING THE  
PRODUCTION OF DISCOVERY MATERIAL**

Pursuant to Fed. R. Civ. P. 26(c), Plaintiffs Abraham Barkhordar, Sarah Zelasky, and Ella Wechsler-Matthaei, together with Defendant President and Fellows of Harvard College, jointly request that this Court enter (i) the attached Proposed Protective Order governing the designation, use, and disclosure of confidential information in this litigation (attached hereto as Exhibit A), and (ii) the attached Proposed Order regarding the production of discovery material (attached hereto as Exhibit B).

Dated: August 2, 2022

Respectfully submitted,

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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

I hereby certify that, pursuant to D. Mass. Local Rule 7.1(A)(2), counsel for Defendant conferred with counsel for Plaintiffs, who join in and assent to the relief requested herein.

/s/Anton Metlitsky

Anton Metlitsky

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 2, 2022.

/s/ Anton Metlitsky  
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